

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

vs.

HASSAN AHMED DAHIR

§
§
§
§
§

3:10-CR-00260 (7)
JUDGE HAYNES

DEFENDANT HASSAN AHMED DAHIR'S MOTION TO JOIN CO-DEFENDANTS'
MOTIONS IN LIMINE AT DOCKET ENTRIES NO. 1551, 1861, 1867, and 1868

Comes Defendant, Hassan Ahmed Dahir, through undersigned counsel, Patrick T. McNally, and moves this Honorable Court for permission to join Co-Defendant's Motions *In Limine* filed in this case. Defendant Dahir incorporates by reference the arguments and law stated in each respective motion as if stated herein. The Motions filed by the Co-Defendants are:

1. Co-Defendant, Andrew Kayachith's, Motion *in Limine* no. 2 to Exclude Government's Use of Purported 404(b) Evidence as it relates to conduct assigned to Defendant, Hassan Dahir. (Docket Entry no. 1515.) Though the Government's Notice of 404(b) evidence dated August 23, 2011, did not identify any said evidence pertaining to Defendant Dahir, the revised Government's Witness List names Officer Stephaine Fogel and Branden Fandel with the Owatona Police Department to offer 404(b) evidence "secondarily [against] defendants 1 ... 7 ... 30. Defendant Dahir is identified as defendant no. 7 on the Second Superseding Indictment. (Docket Entry no. 591).
2. Co-Defendant Fatah Haji Hashi's Motion *In Limine* Regarding alleged Admissions to the extent the legal arguments would similarly apply to alleged admissions the Government intends to attribute to Defendant Dahir and seeks admission at trial. (Docket Entry no. 1861).
3. Co-Defendant Idris Fahra's Motion *In Limine* to Prohibit the Use of "Victim." (Docket Entry no. 1867).
4. Co-Defendant Idris Fahra's Motion *In Limine* to Prohibit the Use of Diminutive Terms When Referring to Witnesses. (Docket Entry no. 1868).